

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America
v.
Anthony Tyrone SAUNDERS III

Case No. 2:22-mj-377

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 17, 2022 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

18 USC 922(g)(1)
18 USC 841(a)(1)

Offense Description

Knowingly Possess a Firearm by a Convicted Felon
Possession of a controlled substance with intent to distribute

This criminal complaint is based on these facts:

SEE ATTACHED

☒ Continued on the attached sheet.

S. Chappell

Complainant's signature

S. Chappell ATF TFO

Printed name and title

Sworn to before me and signed in my presence.

Via FaceTime

Date: May 26, 2022

City and state: Columbus Ohio

Elizabeth A. Preston Deavers
Elizabeth A. Preston Deavers
United States Magistrate Judge

PROBABLE CAUSE AFFIDAVIT**Anthony T SAUNDERS**

I, Samuel Chappell, being duly sworn, depose and state that:

1. I have been an Officer with the Columbus Division of Police (CPD) since 2007. I have been assigned to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) as a Task Force Officer (TFO) since 2017. As a result of my training and experience, I am familiar with state and federal laws pertaining to firearms and narcotics violations, among other offenses.
2. This affidavit is being submitted in support of an application for a criminal complaint against Anthony T SAUNDERS III hereinafter referred to as SAUNDERS III for knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, and the firearm was in and affecting interstate and foreign commerce, in violation of 18 U.S.C. 922(g)(1) and 924(a) and knowingly possess with intent to distribute a controlled substance in violation of 18 U.S.C. 841(a)(1).
3. The facts set forth within this affidavit come from the Affiant's own personal involvement with the investigation, as well as information provided by other law enforcement officers and reports. The information outlined below does not contain all details or all facts of which I am aware relating to this investigation but rather is provided for the limited purpose of establishing probable cause that SAUNDERS III committed this offence.
4. On or about May 17, 2022, uniformed Columbus Police Officers were contacted by an officer in plain clothes that was conducting surveillance. The plain clothes officer had observed SAUNDERS III who the officer knew by sight exit a home near Duxberry Ave carrying what the officer believed to be a handgun. Another plain clothes officer was in the area and was able to follow SAUNDERS III. The plain clothed officers coordinated with uniformed officers who were able to arrive in the area.
5. Uniformed officers approached SAUNDERS III as he was standing on the rear porch of 1120 E 22 Ave. with Antonio Davis. Officers gave SAUNDERS III verbal commands to show his hands and not to move. SAUNDERS III ignored the commands and entered the home. Davis listened to officers and stayed on the porch. While on the back porch officers could hear SAUNDERS III speaking to someone inside of the home.
6. SAUNDERS III exited the home after approximately 20-30 seconds. Officers detained SAUNDERS III. The owner of the residence arrived at scene. The owner contacted an adult who was inside of the residence. The adult exited the residence.
7. Officers explained to the owner their belief that SAUNDERS III had entered the home and hidden a firearm. Officers asked the owner of the residence for consent to search the residence. The owner gave consent.
8. Officers located a loaded Taurus model PT111 9mm pistol bearing serial number TYA52693 in the upstairs bathroom. The firearm had what officer believed to be plaster ground into the

PROBABLE CAUSE AFFIDAVIT**Anthony T SAUNDERS**

handle. Officers found an indentation in the bathroom plaster directly in the path where the firearm was recovered.

9. Officers arrested SAUNDERS III and transported him to the Franklin County Jail. While inside the jail a Franklin County deputy found a bag on the ground near SAUNDERS III that had a white powder and pills inside. Officers reviewed footage and observed SAUNDERS III removing the bag from his pants and dropping it on the ground.
10. The Columbus Police Crime Laboratory conducted an analysis of the contents of the bag. The laboratory found that the white powder was approximately 2.9 grams of fentanyl and the pills were found to not contain a controlled substance.
11. Your Affiant is aware through training and experience that user amounts of fentanyl are measured in 1/10th or less of a gram.
12. The Columbus Police Crime Laboratory conducted a DNA analysis of swabs taken from the Taurus model PT111 9mm pistol bearing serial number TYA52693 and its magazine.
13. The DNA recovered from the firearm was compared to a standard from SAUNDERS III. The results showed that there was a mixture of two individuals. SAUNDERS III cannot be excluded as the major contributor of this profile. Based on these results, it is at least 33.1 nonillion times more likely if SAUNDERS III is a contributor than if this were a mixture of two unknown, unrelated individuals. This analysis provides support that SAUNDERS III is a contributor to this profile.
14. The DNA profile from the magazine was compared to a standard from SAUNDERS III. The results showed it as being a mixture of three individuals, including an unknown male contributor. SAUNDERS III cannot be excluded as a contributor to the major component of this profile. Based on these results, it is at least 11.8 septillion times more likely if SAUNDERS III is a contributor than if this were a mixture of three unknown, unrelated individuals. This analysis provides support that SAUNDERS III is a contributor to this profile.
15. SAUNDERS was prohibited from possession of a firearm based upon having been previously convicted of the following crimes punishable by a term of imprisonment exceeding one year:
 - a. Franklin County, Ohio Court of Common Pleas Case 15CR005484 for improperly handling a firearm.
 - b. Franklin County, Ohio Court of Common Pleas Case 17CR000660 for Weapons Under Disability.
 - c. Franklin County, Ohio Court of Common Pleas Case 18CR004783 for Weapons Under Disability.
 - d. Franklin County, Ohio Court of Common Pleas Case 18CR004836 for Possessions of Drugs.
 - e. Franklin County, Ohio Court of Common Pleas Case 19CR000210 for Weapons Under Disability.

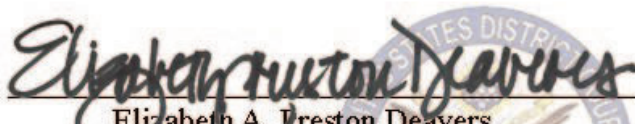
PROBABLE CAUSE AFFIDAVIT**Anthony T SAUNDERS**

16. Records from the Franklin County, Ohio Court of Common Pleas Case 18CR004836 show that on or about April 25, 2019, SAUNDERS III signed a guilty plea. This plea indicated that SAUNDERS III understood the maximum penalty for the crime he was pleading guilty to was eighteen (18) months of incarceration.
17. Your Affiant confirmed via ATF resources that the aforementioned firearm possessed by SAUNDERS III on or about May 17, 2022, was not manufactured in the State of Ohio and therefore had previously traveled in interstate commerce to reach the State of Ohio.
18. The aforementioned offenses occurred in Franklin County, Ohio, in the Southern Judicial District of Ohio.
19. Based on this information, your affiant believes probable cause exists that SAUNDERS III knowingly possess with intent to distribute a controlled substance in violation of 18 U.S.C. 841(a)(1) and knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, that is, Taurus model PT111 9mm pistol bearing serial number TYA52693 and the firearm was in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, 922(g)(1) and 924(a)(2).



ATF TFO Samuel Chappell

Sworn to and subscribed before me this day of May 26, 2022, at 3:51 PM Columbus, Ohio.



Elizabeth A. Preston Deavers
United States Magistrate Judge

